

COMPLIANCE POLICY

Madrid, december 19, 2022

Konecta



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1.- PURPOSE

This Compliance Policy (hereinafter, the “**Policy**”) establishes the basic principles and guidelines regarding regulatory compliance for **Grupo KONECTANET S.L.U.** (hereinafter, “**Konecta**” or the “**Group**”).

In this sense, Konecta’s Board of Directors has worked on the implementation of a **Compliance and Criminal Risk Prevention Model** (hereinafter, the “**Compliance Model**”, or the “**Model**”) in order to promote a true ethical business culture, as well as to prevent and detect any regulatory irregularities or unlawful behaviors.

Thus, Konecta reinforces and promotes its ethical-business culture, establishes its control mechanisms, and reduces the possibility of regulatory breaches within the organization, either directly or indirectly, expressly stating the rejection of any unlawful or unethical act.

Konecta’s corporate governance system is inspired and based on the commitment to ethical principles, integrity, and leadership in the application of best practices, articulated around the defense of social interest, and the creation of sustainable value for Konecta, its employees, suppliers, and customers.

This Policy intends to show Konecta’s willingness to establish a culture of regulatory compliance that allows for the development of an honest, upright, and transparent professional conduct, as well as to show a firm condemnation of any kind of criminal or any other unlawful conduct, which, in no case, shall be justified on the basis of a benefit to the organization.

In this way, and in line with the provisions of the applicable legislation, Konecta has adopted internal regulatory instruments, as well as adequate control and management systems for the detection, prevention of regulatory risks and non-compliance.

2.- SCOPE OF APPLICATION

This Policy applies to all Konecta entities, and is endorsed by the Company’s Board of Directors. Anyone who is part of the Company is responsible for promoting the principles and commitments contained in this Policy at Konecta.

Given that many of Konecta Group Companies have their headquarters outside the EU, they shall adjust their internal regulations to the requirements and regulations of each State, respecting and safeguarding the basic principles herein outlined, with a view to continuously improve in matters related to regulatory compliance, and refine all control systems in management.

3.- BASIC ELEMENTS AND GENERAL PRINCIPLES OF ACTION

Konecta has taken on board the will to promote an ethical and compliance culture. This includes respect for applicable regulations and voluntary commitments, as well as adaptation to the best practices in compliance.

The Group's Compliance Model includes the organization's performance criteria and control elements, which prevent non-compliance with obligations and commitments in its scope of activity.

The principles of action on which Konecta's actions are based, and which all the members of the Group must respect and ensure compliance with, are the following:

- **To act at all times under the current legislation**, the internal rules of application, as well as the Code of Ethics which establishes the values and principles that inspire Konecta's actions.
- To promote a preventive culture based on the principle of **"zero tolerance"** towards the commission of irregularities in any regulatory area, promoting the application of the principles of ethics, and responsible behavior by all the professionals acting on behalf of Konecta.
- To disseminate the **rules, policies and procedures** that should govern the performance of the members of the organization within the Group, and the instruments necessary to do so.
- To provide a **regulatory and compliance framework** with third parties with whom we maintain business relationships, in order to ensure full and honest practices within the framework of free competition.
- To promote **self-monitoring processes** in the actions and decision-making processes by Konecta members, so that they take into account the conjunction of four basic premises: (i) that the action is in accordance with the Code of Ethics; (ii) that it is legally valid; (iii) that it is aligned with the strategic objectives of the company; (iv) that lies within the scope of its competences and therefore, subject to liability.
- To strengthen the **authority and independence of the Compliance Committee**, as the body responsible for ensuring the proper functioning of the Compliance Model, as well as the rest of the applicable internal regulations.
- To make available to all members of the organization the appropriate communication channels, and to establish the **duty to report and file complaints** in good faith, of any irregular conduct of which they have knowledge or suspicion. Konecta guarantees, in all case, the confidentiality of the respondents and the complainants, as well as the absence of reprisals against the complainants in good faith.
- **To raise awareness, train and sensitize** the members of the organization on the importance of acting in accordance with the current legislation, and of fulfilling the commitments undertaken voluntarily by Konecta in the development of their functions.

4.- FOUNDATIONS OF THE COMPLIANCE AND CRIMINAL RISK PREVENTION MODEL

Konecta's compliance model is the compilation of existing policies, procedures and controls within the Group that prevent, detect, or allow us to react to the commission of potential wrongdoing.

Essentially, and without exhaustive character, Konecta has a Code of Ethics, a whistleblowing channel(Ethics Line), training plans, a monitoring system that allows for the surveillance of risks and breaches, as well as sufficient human, material, and financial resources to prevent breaches of the current laws.

All of the above contributes to the effective compliance and application of the Compliance Model, mitigating any potential regulatory irregularities that may occur in the development of its activity.

4.- UPDATE AND REVIEW

This Policy, as well as the Compliance Model, shall be subject to periodical review and improvement, especially when regulatory, social, business or any other circumstances so require.

NOTE: This Compliance Policy was revised and approved on 19 December 2022 by the Konectanet Group's governing body, S.L.U.